

## THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET

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January 24, 2023

## **BY ECF**

Hon. Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: N.J. obo G.J. v. N.Y. City Dep't of Educ., et al. Index No. 18 CV 6173 (JMF) (BCM)

Dear Judge Furman,

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York and attorney for the Defendants in the case referenced above. I write to respectfully request a short extension of time to submit an application to the Court in connection with the underlying impartial due process hearing.

Pursuant to the Court's Orders dated January 10, 2023 and January 15, 2023, the parties are due to file an appropriate motion concerning the underlying administrative due process hearing by today, January 24, 2023. The parties have been discussing and drafting a stipulation to submit to the Court that addresses the underlying hearing. That potential agreement is not yet finalized, at least in part because Defendants' counsel was out of the office this afternoon due to an important medical appointment for a close family member. I apologize for the lateness of this application, but the parties respectfully request a short extension, to tomorrow, January 24, 2023, to submit any relevant application.

I have communicated with Elisa Hyman, Esq., Plaintiff's attorney, and Plaintiff joins in this request.

Thank you for your consideration of this matter.

Respectfully submitted,

s/

Andrew J. Rauchberg Assistant Corporation Counsel

Elisa Hyman, Esq. cc: The Law Offices of Elisa Hyman, P.C. Attorneys for Plaintiffs

> Application GRANTED. The deadline to file any motion seeking a stay of administrative proceedings, excusing of exhaustion, or any other appropriate relief is hereby extended, nunc pro tunc, to January 25, 2023. The Clerk of Court is directed to terminate ECF No. 176.